

10-13-06

TESTIMONY OF CHRISTOPHER D. ALLEGRE - CDO# R3-2006-1019  
FILING JOINTLY w/ BRUCE PAYNE - CDO# R3-2006-1000  
DUE - 10-13-06 - 1700 HRS RWQCB

I HAVE BEEN NOTIFIED BY THE RWQCB TO SUBMIT TESTIMONY  
IN REGARDS TO THE ISSUING OF A WASTEWATER CEASE & DESIST ORDER  
ON MY RESIDENTIAL PROPERTY LOCATED AT 1071 GREENOAKS DR. IN LOS  
OSOS, CA AND TO ARTICULATE REASONS FOR NOT ISSUING SUCH AN ORDER.

Mr. BRUCE PAYNE (CDO# 1000) RESIDES NEXT DOOR AT 1051 GREEN  
OAKS DR. OUR PROPERTIES ARE OF APPROX EQUAL SQ FOOTAGE, DISTANCE  
TO GROUND WATER (APPROX 30') & 2 PEOPLE LIVE IN EACH HOME. MR. PAYNE  
WILL SUBMIT ARGUMENTS THAT ARE SUBSTANTIALLY THE SAME AS  
MY OWN & WE SUBMIT THESE ARGUMENTS JOINTLY.

MY VIEWS ON THE SELECTION SYSTEM USED TO SELECT THE FIRST  
50 CPO VICTIMS ARE EXPRESSED IN A COPY OF THE ENCLOSED  
LETTER TO MICHAEL THOMAS DATED 8-17-06.

MY MORAL INDIGNATION CONCERNING THIS PROJECT KNOWS  
NO BOUNDS. THE IDEA THAT PRIVATE CITIZENS CAN PURCHASE A  
RESIDENCE PERMITTED BY A GOVT AGENCY & THEN FACE CRIMINAL  
PROSECUTION FOR JUST LIVING THERE IS BEYOND MY UNDERSTANDING.  
I PREFER TO EXPRESS THESE VIEWS ORALLY DURING MY HEARING.

SEE BY REFERENCE APPENDIX A IN 2002 GROUND WATER MONITERING

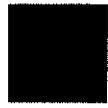
RESPECTFULLY:

Christopher D. Allegre:

P.O. Box 6617

LOS OSOS, CA-

93412



## **APPENDIX A**

### **Monitoring Well Construction/Destruction Details (Replacement Wells)**

Exhibit K Stillman Affidavit Reference Brief for  
Hearing April 28, 2006

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL "COAST REGION"

FILE

INTERNAL MEMO

TO: B. Leonard, K. Jones FROM: Roger Briggs

DATE: December 14, 1984 SIGNATURE: Roger Briggs

SUBJECT: Baywood/Los Osos: SWCSA #9

On December 12, 1984, Frank DeMarco and I met with San Luis Obispo County Engineering staff; Clint Milne, Jim Jonte, and George Gibson, County Environmental Coordinator, Vince Morici, and Lab Analyst, Percy Garcia. The County requested the meeting to discuss our staff report for the December 7 agenda for Baywood/Los Osos enforcement action.

Three minor editorial comments were noted, and there was a lengthy discussion about interpreting water quality data. Although County staff agrees there is evidence of human fecal bacteria in the surface waters, they feel we've overstated the significance of this. If there are problems, the County contends that the proposed project will do nothing to curtail them.

Ground water analyses in Tables 2 and 3 do not indicate human bacterial contamination, except in poorly constructed monitoring wells, according to Percy Garcia. The County had these wells installed. Frank inspected these wells last week with Percy and agrees there is a potential for contamination from surface runoff. County staff maintains the data indicates nitrate concentrations aren't going up much. Our wording in the staff report is "continued degradation."

The County does not want to debate these points on the 7th. They agree a project is needed and are proceeding as quickly as possible, according to Clint. The Request for Proposals for soils and EIR work will be developed after a "pre-EIR" meeting with concerned agencies. They hope to have this meeting December 5 or 6. My November 13th memo reports that County staff was preparing RFP's on the Supervisor's November 13th agenda. Actual proposals were to be received from consultants by December 7. Now we find out the RFP's haven't been prepared yet.

Clint gave us a schedule for financial decisions (attached) and Jonte gave us their project schedule (attached). As I mentioned, they're already behind schedule for RFP's.

We've been trying for over a year to tell the County to complete the EIR before design, but they've said they wouldn't do it that way. At our meeting, Clint said design costs will have to come out of bond money, and they can't sell bonds until an EIR is complete. So they'll have to complete the EIR before starting design. EIR certification is currently scheduled by the County for July, 1985, with design start-up in September, 1985. This shows how badly they've missed the November 1, 1984, compliance schedule date for beginning design (10 months).

RWB:bf

\*\*\* attachments - 2 schedules

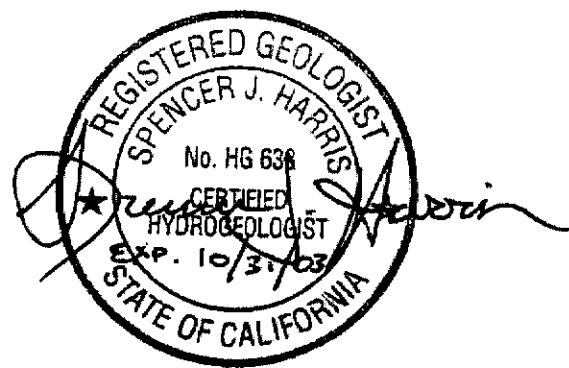
AME

DR  
JL

LOS OSOS NITRATE  
MONITORING PROGRAM

JUNE-JULY 2002 GROUND WATER MONITORING

Prepared for the LOS OSOS  
COMMUNITY SERVICES DISTRICT



November 2002

CLEATH & ASSOCIATES  
1390 Oceanaire Drive San Luis  
Obispo, California 93405

(805) 543-1413

THURS.

(1)

Statement of Christopher D. Albee  
CDO #2 - 2006-1019 - FILING JOINTLY / CDO #1000  
I have been notified by the RVQCB  
that I must testimony in regards to the  
issuing of a cease & desist order on my  
real property located on 1071 greenoaks dr.  
in doe oaks, ca & its artificial reasons  
for not issuing such an order.  
Mr. Bruce Payne (CDO #1000) is my next  
door neighbor at 1051 Green Oaks Dr & our  
properties are of equal 20 footage, same  
distance from ground water (approx 30') & have  
2 people living in each home. Mr. Payne will submit  
technical & legal arguments that are essentially  
the same as my own & we submit these arguments  
jointly. My own & additional arguments revolve  
around the morality of the issue. This project  
was never cost-benefit sustainable. The idea of  
a "zone" within a community, paying for a project  
of this size & complexity, that supposedly benefits  
the entire water basin is ridiculous. Imagine a  
small town paying for a section of interstate  
highway just because we derive some benefit

P.2

overdate stiffed down (2) the throats of people that have been paying for their & everyone else problems via property income & sales taxes for years & now this project comes along that will about double these obligations for <sup>20-30</sup> years. all this induces a non hayardous mitigate problem that may possibly show results in 25 years. (This is as per Metcalf & Eddy report). Don't expect me to vote on an "open-and 218" procedure with no spending caps & lets have no single source bidding. I really don't see why this is not considered a public works project out of public funds (i.e. our money) ~~cost~~ at the very least we should be able to get an interest free SRF loan - this would save approx 20 mil alone.

I object to the methods used to choose the first 50 victims. (see attached letter to Michael Tolosa) Businesses were ~~to~~ excluded, the "Random" selection was complicated & most witnessed by both sides. We aren't the agency that issued the legit permit for the Homez now allegedly "polluting" our water supply. I don't see why any of us should get a C.O.

Nov 15 06 01:49p

Antoinette Payne

805-528-2642

p.1

We are facing horrendous cost & disimpation for a  
heavy 1-2 points of nitrate. You would have to eat  
127 ~~gallons~~ gallons of water at maximum ~~allowable~~  
~~allowable~~ nitrate levels to consume the  
nitrate in a pound of bacon! This awful  
cost with no clear benefit to the citizen.  
Our eco-structure is the root cause of all  
the deliberation over this matter.

**AFFIDAVIT OF R. GLENN STILLMAN**

I, R. Glenn Stillman, herein declare that:

1. I am Vice-President and Principal Engineer with Alaska Petroleum Environmental  
Engineering, Inc. that has an office in Garden Grove, California.
2. I have a Bachelor of Science in Chemical Engineering from the University of Illinois-Chicago, a Masters of Science in Petroleum Engineering from the University of Alaska-Fairbanks, and have completed all course work at the University of Alaska-Fairbanks for a Masters of Science in Environmental Engineering. I have worked in the environmental, construction and petroleum industries for over 20 years. Since March 1991, I have held California Contractor's License 615579. The classifications under this license are General Engineering "A", Hazardous Substance Removal and Remedial Actions Certificate ("HAZ"), Asbestos Certification, and C-57 (Well Drilling).
3. During my career, I have designed and drilled hundreds of wells including oil production wells, injection wells, potable water wells, water and waste disposal wells, groundwater remediation wells, and groundwater monitoring wells. I have also inspected and sampled hundreds of wells. Finally, I have been involved in the plugging and abandonment of scores of these wells. I am familiar with United States Environmental Protection Agency (USEPA) and State of California requirements for the proper installation of various wells, and the requirements for their closure. I have worked in the past with various California Regional Water Quality Control Boards, including those at Los Angeles, Santa Ana, San Diego, San Francisco Bay Area, Lahontan, and North Coast Regions.
4. I was retained by the Law Office of Matthew J. Nasuti to investigate and potentially provide expert testimony in a federal lawsuit regarding the proposed Los Osos sewer project (hereafter referred to as the "Sewer Project"). My investigation has resulted in the following conclusions:
5. There is nitrate contamination at various locations in the upper aquifer under Los Osos in concentrations that exceed the Maximum Contaminant Level (MCL) as promulgated by the USEPA. The MCL for nitrate reported as nitrogen is 10 milligrams per liter (or 45

**WELL REPLACEMENTS**

Cleath & Associates supervised the construction of 12 monitoring wells and the destruction of two wells. Eleven of the twelve new wells were constructed at former monitoring well locations after removing the original well casings and annular fill materials. The twelfth well was constructed approximately 160 feet west of a former monitoring well location due to conflict with fiber optic lines (the older well was destroyed). Drilling services were provided by S/G Drilling Company (Lompoc). The work was conducted between May 16 and May 28, 2002. All new wells were completed with 2-inch diameter PVC and replaced older 1.5-inch diameter PVC wells. Construction of the new wells complies with State and local regulations. A summary of the wells replaced and destroyed is shown below in Table 1, including differences in perforated intervals between the old and new wells. Details of each well construction are included in Appendix A.

**Table 1**  
**Well Replacements and Destructions**  
**May 2002**

Original Well ID* (constructed in 1982)	Location	Original (1982) well perforated interval (depths in feet)	New (2002) well perforated interval (depths in feet)
30S/10E-13L5	Howard/Del Norte	32-35	26-36
30S/10E-13Q1	Woodland	97-100	95-105
30S/11E-7K2	Santa Ysabel/12th	62-65	destroyed
30S/11E-7K (new)	12 <sup>th</sup> /Santa Ysabel	(new well)	55-65
30S/11E-7L3	Santa Ysabel/5th	42-45	40-50
30S/11E-7R1	El Moro/12th	27-30	25-35
30S/11E-8N2	El Moro/So. Bay Blvd.	42-45	40-50
30S/11E-8N3	El Moro/So. Bay Blvd.	87-90	destroyed
30S/11E-18B1	Ramona/10th	29-32	25-35
30S/11E-18C1	Pismo/5th	27-30	25-35
30S/11E-18J6	Los Olivos/Fairchild	22-25	25-35
30S/11E-18L3	Palisades	52-55	43-53
30S/11E-18L4	Ferrell	22-25	25-35
30S/11E-18N1	Manzanita/Ravenna	87-90	85-95

\*NOTE: SLO County and the DWR are in the process of assigning new Well ID's for the replacement wells. These new ID's will be incorporated into future monitoring reports.

Although 2 wells were destroyed only 1 was a "new well" the rest were "Drilled out and Removed Borehole materials from 1982 well construction."

See Page 9 of Site Visit Report

that its treatment system has impacted the upper aquifer with nitrates. The Sewer Project does not call for the abandonment of the illegal wells (the nitrate "funnels"), or for conducting remedial work on the upper aquifer as was previously discussed above (i.e., extraction of clean water and injection into the lower aquifer, extraction of nitrate contaminated groundwater for agricultural use, etc. which will increase the separation and remove contaminated water). My fear is that the community will spend \$100,000,000 + and see no appreciable improvement in groundwater quality. The Agencies have made no guarantee that the Sewer Project will correct the problem. If funds have to be expended, a number of more cost-effective solutions based upon sound engineering have been "on the table" for years and they should not have been disregarded.

24. Based upon my evaluation of the nitrate data and prior to expending in excess of \$100,000,000 on a Sewer Project that will not correct the problem, a two step remedial project should be implemented. If implemented, it will remove the contaminated water from the illegal wells and/or provide valid data that can be assessed to determine if there even is a nitrate problem in Los Osos. If successful, the savings to the community would be about \$99,855,000. The proposed scope of work is:

17. 1. Pump the Brown & Caldwell illegal wells: \$ 45,000

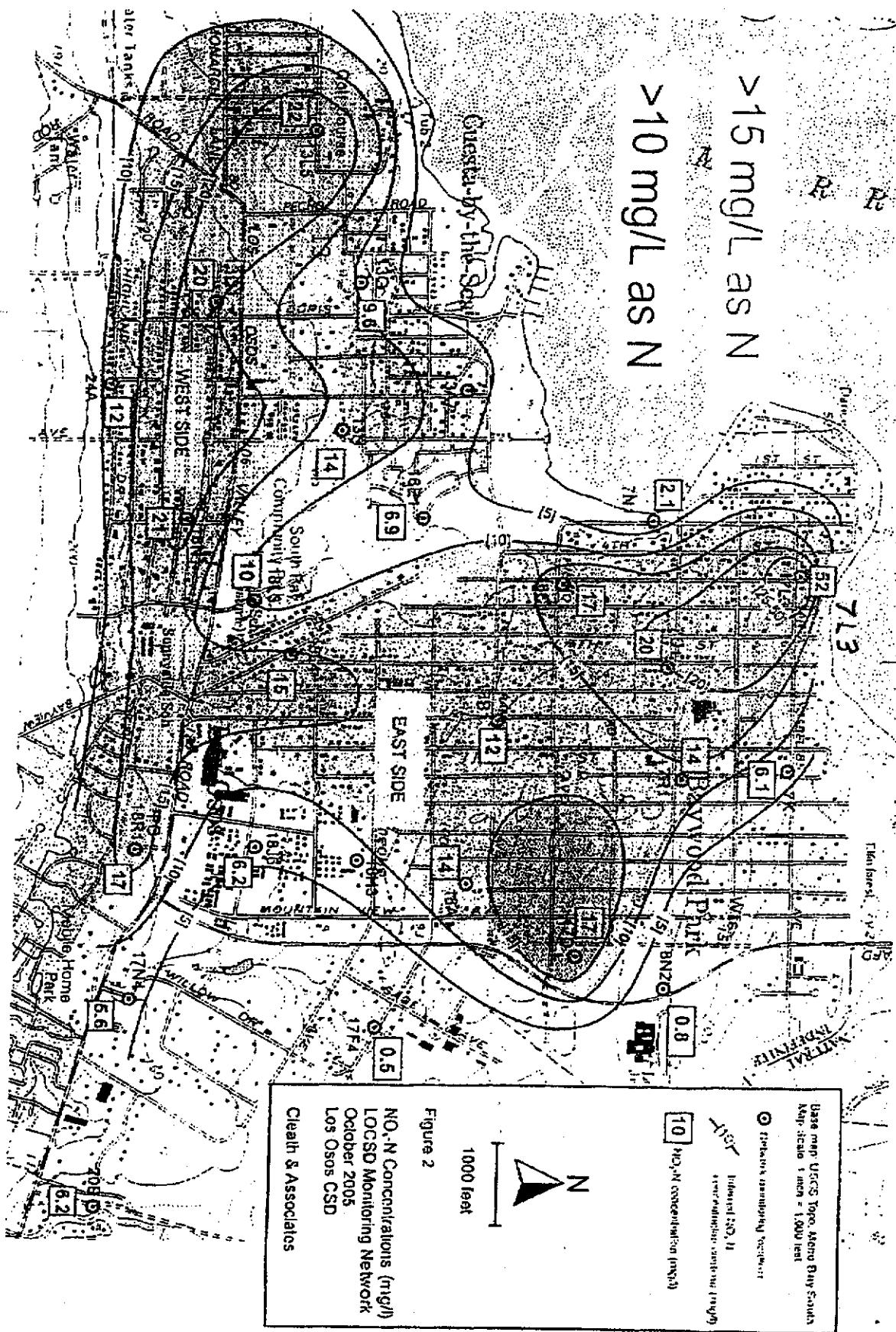
18. The cost includes all equipment and personnel to purge the wells to collect and analyze a  
19. representative water sample of the upper aquifer. If nitrates are detected above the MCL,  
20. that well will be pumped for a duration of one week. The purged water will be used for  
21. irrigation purposes at a local farm. For cost estimating purposes, I assumed that all 10 wells  
22. will require one week of pumping.

23. 2. Abandonment of the ten Brown & Caldwell illegal wells and drilling of replacement  
24. wells: \$100,000

25. The cost includes all equipment and personnel to abandon the wells pursuant to the  
26. requirements in 74-90. Ten wells will be drilled about 50 feet from the illegal wells to obtain  
27. valid data. The cost includes disposal of all the drill cuttings at a local landfill, although a  
28. local farm would probably accept the soil as it is non-hazardous. For cost estimating

>15 mg/L as N

>10 mg/L as N



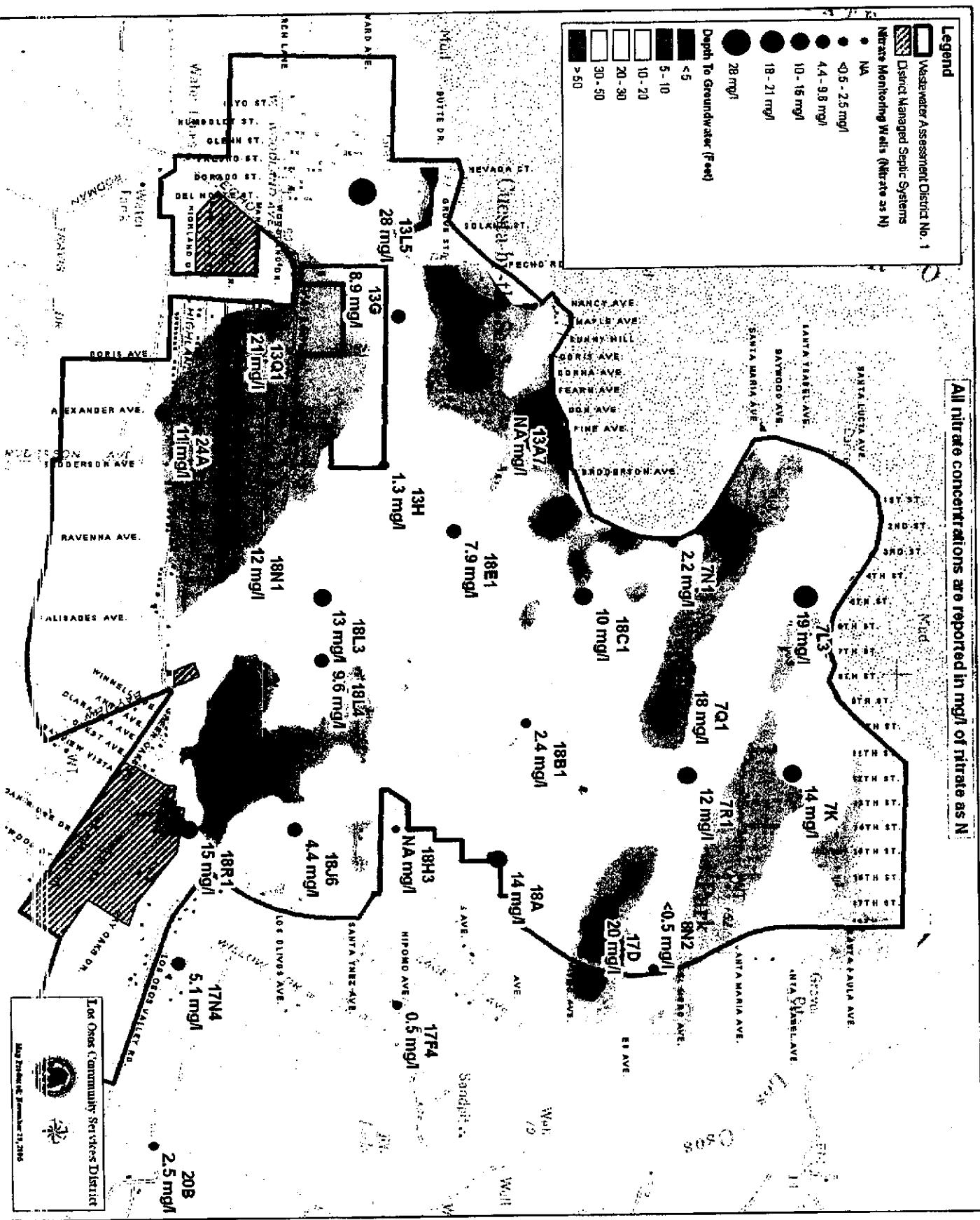
117  
Used by Prosecution April 25, 1908 "The latest well test data

**Legend**

Wastewater Assessment District No. 1  
District Managed Septic Systems

- NA
- <0.5 - 2.5 mg/l
- 4.4 - 9.8 mg/l
- 10 - 15 mg/l
- 18 - 21 mg/l
- 28 mg/l
- <5
- 5 - 10
- 10 - 20
- 20 - 30
- 30 - 50

All nitrate concentrations are reported in mg/l of nitrate as N



Well Test Data Presented by Rob Miller - ACL Herring Inc. '06

**30S/11E-7L3 (replacement well)**  
**West side of 5<sup>th</sup> Street north of Santa Ysabel Avenue, Los Osos**

Co. Health Permit No. 2002-MW-144

All depths in feet below grade

Lithologic Log from 1982: 0 - 45 feet Tan brown sand, very fine to medium grained, firm.  
 New 2002 footage: 45 - 50 feet (heaving sands, unable to retrieve sample)

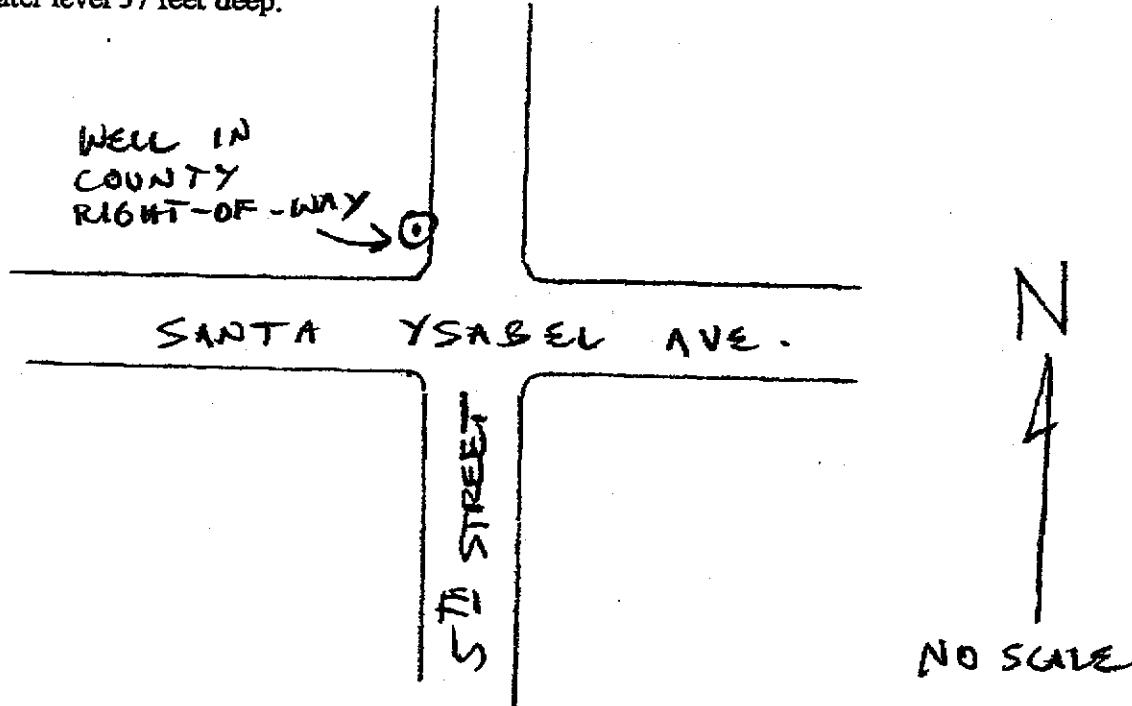
Drilled out and removed borehole materials from 1982 well construction. Original perforated interval was 42-45 feet deep.

2002 Replacement Well Construction (same borehole)

Well: 0 - 50 feet 2-inch PVC schedule 40 casing with threaded couplings  
 40 - 50 feet 0.020 perforations with end cap

Annular Space:  
 0 - 2 feet new traffic rated well box/wellhead set in concrete  
 2 - 33 feet cement/bentonite grout sanitary seal  
 33 - 34 feet bentonite transition seal  
 34 - 50 feet RMC Lapis luster #3 filter pack

Static water level 37 feet deep.



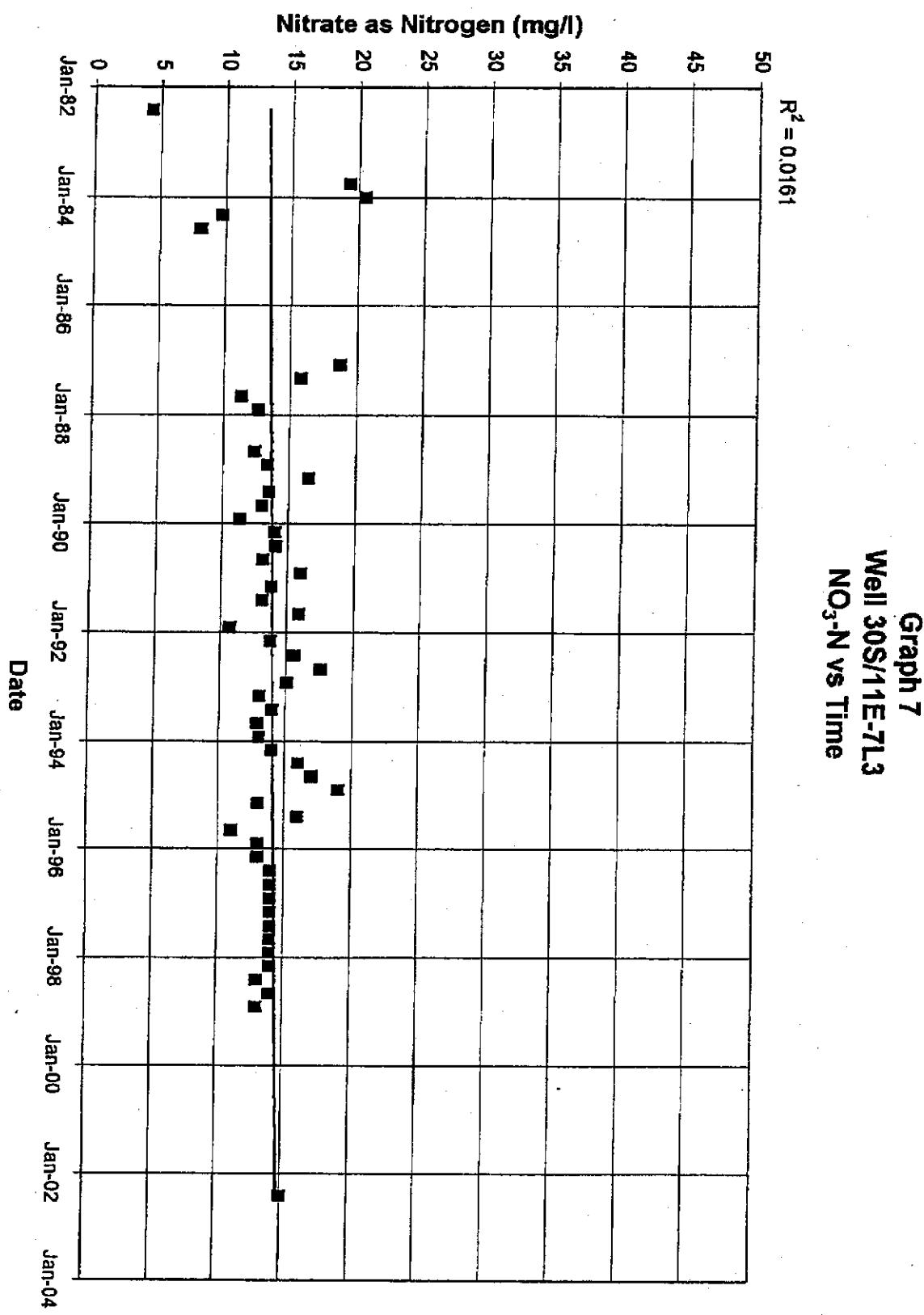


Table 3  
April 2005 Water Quality Results

Well ID	Sample Date	Temp °C	pH-field units	TDS mg/l	EC µmhos/cm	Ca mg/l	Mg mg/l	K mg/l	Na mg/l	HCO <sub>3</sub> mg/l	SO <sub>4</sub> mg/l	Cl mg/l	NO <sub>3</sub> -N mg/l	B mg/l	DTW feet
30S/10E-13G	4/15/05	18.3	6.05	270	450	19	19	1.1	43	65	12	65	8.9	<0.2	37.67
30S/10E-13H	4/19/05	18.5	6.31	130	180	14	7	0.4	17	50	13	11	1.3*	0.059	23.10
30S/10E-13L5	4/14/05	19.0	5.78	1100	2100	90	99	1.2	97	60	44	460	28	<0.2	19.25
30S/10E-13Q1	4/19/05	19.0	6.11	470	710	28	21	1.5	77	73	24	120	21*	0.097	83.08
30S/10E-24A	4/21/05	18.1	6.52	220	340	14	9.7	1.7	38	44	5.1	46	11	0.036	154.13
30S/11E-7K	4/14/05	18.5	6.60	410	800	36	34	2.0	63	140	47	82	14*	<0.2	47.83
30S/11E-7L3	4/13/05	18.5	6.44	480	900	25	22	2.3	97	140	57	110	19*	<0.2	34.00
30S/11E-7N1	4/13/05	21.2	6.37	120	240	12	9.4	1.1	21	70	5.9	28	2.2	<0.2	2.40
30S/11E-7Q1	4/14/05	18.5	6.08	340	720	30	23	4.3	65	75	38	84	18*	<0.2	2.87
30S/11E-7R1	4/13/05	18.5	5.89	260	530	25	17	2.4	41	95	28	51	12	<0.2	18.33
30S/11E-8N2	4/15/05	17.7	6.49	67	88	4.2	3.9	0.8	8.7	32	6.5	3.7	<0.5*	<0.2	32.08
30S/11E-17D	4/19/05	17.6	6.42	360	600	23	20	1.6	68	80	31	64	20*	0.19	49.42
30S/11E-17F4	4/21/05	18.6	6.13	330	560	30	24	1.4	58	130	15	99	0.5*	0.049	43.92
30S/11E-17N4	4/20/05	17.1	5.98	200	320	13	11	0.91	34	40	12	48	5.1	0.058	20.50
30S/11E-18A	4/21/05	18.7	6.27	330	520	32	19	3.5	51	82	34	63	14*	0.18	na
30S/11E-18B1	4/14/05	17.3	6.18	110	210	9.8	5.2	3.3	26	80	12	6.7	2.4*	<0.2	14.42
30S/11E-18C1	4/13/05	17.9	6.08	280	580	22	19	1.5	51	100	38	55	10	<0.2	14.33
30S/11E-18J6	4/20/05	18.2	6.10	240	440	22	18	1.5	48	85	30	44	7.8*	<0.2	20.75
30S/11E-18L3	4/13/05	19.2	6.03	210	480	22	32	3.2	54	180	19	55	4.4*	0.10	18.04
30S/11E-18L4	4/15/05	18.1	5.99	360	630	33	28	2.8	42	60	25	59	13*	<0.2	35.00
30S/11E-18N1	4/19/05	19.5	6.07	370	600	23	23	3.2	61	100	34	78	9.6*	<0.2	15.50
30S/11E-18R1	4/20/05	16.8	5.87	390	580	24	21	0.9	59	50	17	110	15	0.14	10.50
30S/11E-20B	4/21/05	18.7	6.34	340	570	30	30	1.7	47	100	27	100	2.5*	0.06	na
30S/11E-21D	4/12/05	18.9	6.71	600	1100	63	64	<1.0	69	380	70	79	8.2	<0.2	6.00

\*other forms of nitrogen detected - see lab sheets. Note: HCO<sub>3</sub> reported as mg/l CaCO<sub>3</sub>.

Table 3  
October 2005 Water Quality Results

Well ID	Sample Date	Temp °C	pH-field units	TDS mg/l	EC µmhos/cm	Ca mg/l	Mg mg/l	K mg/l	Na mg/l	HCO <sub>3</sub> mg/l	SO <sub>4</sub> mg/l	Cl mg/l	NO <sub>3</sub> -N mg/l	B mg/l	DTW feet
30S10E-13G	10/18/05	18.9	5.98	310	460	20	19	0.99	41	65	12	80	9.6	<0.05	38.85
30S10E-13H	10/20/05	20.3	6.08	180	250	19	8.9	0.48	16	75	4.2	20	14	<0.05	23.00
30S10E-13L5	10/13/05	20.4	5.88	1200	1900	96	87	1.1	110	60	33	550	22	0.12	21.27
30S10E-13Q1	10/25/05	18.8	5.99	460	770	33	24	1.6	81	65	26	140	20	0.11	83.10
30S10E-24A	10/27/05	19.0	6.23	210	330	12	9.4	1.1	37	36	4.8	45	12	<0.05	154.08
30S11E-7K	10/14/05	19.8	6.51	330	630	28	25	1.5	60	80	33	98	6.1*	<0.05	49.38
30S11E-7L3	10/12/05	19.9	6.45	580	910	25	22	2.2	130	79	37	92	52*	0.2	35.83
30S11E-7N1	10/11/05	18.7	6.14	160	260	72	9.8	0.9	22	64	5.0	32	2.1*	<0.05	2.8
30S11E-7Q1	10/13/05	20.6	6.15	380	690	32	25	3.7	65	100	46	100	20*	0.13	2.0
30S11E-7R1	10/14/05	19.4	6.03	360	630	32	21	2.7	81	120	33	68	14	0.13	20.0
30S11E-8N2	10/20/05	17.9	6.23	58	98	4.7	4.5	0.90	8.8	55	5.2	6.5	0.8	<0.05	32.63
30S11E-17D	10/20/05	18.5	5.90	300	530	20	18	1.5	83	70	28	67	17	0.15	51.21
30S11E-17F4	10/19/05	23.5	5.83	300	580	24	22	0.84	56	130	15	100	0.5*	0.05	43.88
30S11E-17N4	10/12/05	20.1	5.79	200	310	12	11	0.8	31	40	14	48	5.6	0.05	20.1
30S11E-18A	10/21/05	17.2	5.81	340	580	29	20	3.0	58	85	38	72	14	0.27	na
30S11E-18B1	10/12/05	18.9	5.99	320	550	38	20	7.0	38	95	27	72	12	0.11	15.63
30S11E-18C1	10/19/05	18.5	5.97	370	680	30	27	1.6	63	100	43	97	17	0.10	15.83
30S11E-18E1	10/25/05	18.7	6.19	250	440	22	17	1.4	45	80	28	53	6.9	0.08	24.1
30S11E-18J6	10/21/05	18.5	6.01	370	620	38	23	3.1	55	180	27	60	6.2*	0.12	20.67
30S11E-18L3	10/12/05	19.1	5.91	270	450	24	15	2.9	39	40	19	76	10*	0.07	37.92
30S11E-18L4	10/19/05	19.9	5.88	340	630	27	22	3.2	64	110	38	89	15*	0.12	18.38
30S11E-18N1	10/25/05	19.2	5.88	400	720	30	28	1.9	67	55	29	140	21	0.15	72.48
30S11E-18R1	10/11/05	17.6	5.34	410	630	24	20	0.8	58	20	19	110	17*	0.14	11.9
30S11E-20B	10/18/05	21.7	6.22	330	590	28	0.85	45	110	26	84	6.2	0.06	na	
30S11E-21D	10/11/05	18.9	6.66	850	1400	74	70	0.4	71	470	97	130	6.0*	0.17	10.0

\*other forms of nitrogen detected - see lab sheets. Note: HCO<sub>3</sub> reported as mg/l CaCO<sub>3</sub>.

DTW = depth to water

State of California

## Memorandum

To : Craig M. Wilson  
Senior Staff Counsel

Date : OCT 13 1988

From : STATE WATER RESOURCES CONTROL BOARD

David B. Cohen, PhD., Chief  
Regulatory and Monitoring Branch

Subject: CITIZENS FOR AFFORDABLE WASTE WATER SYSTEMS' PETITION FOR REVIEW OF ACTION AND INACTION BY THE CENTRAL COAST REGIONAL BOARD REGARDING THE LOS OSOS-BAYWOOD PARK AREA PROHIBITION; FILE NUMBER A-525

Sometime ago, you requested that the Division of Water Quality assign a staff member to review the California Regional Water Quality Control Board, Central Coast Region's (Central Coast Regional Board) existing Los Osos-Baywood Park area prohibition.<sup>1/</sup> Additionally, you asked us to determine if the evidence that the Citizens for Affordable Waste Water Systems (C.A.W.S.) submitted along with its petition<sup>2/</sup> warranted review of this prohibition by the State Water Resources Control Board (State Board) on its own motion. Since then, Don Owen of the Regulatory Branch's Technical Support Unit reviewed the supporting material and the record; and, he and Kathie Keber have discussed this matter. They concluded that substantial evidence in the record supports the existing prohibition and that the petitioners' evidence does not justify State Board review of this matter. This memorandum summarizes pertinent information about the prohibition and the petitioners' contentions and reiterates Kathie and Don's conclusions.

### Background

The unincorporated, unsewered coastal communities of Los Osos, Baywood Park, and Cuesta-by-the-Sea, which are located at the western end of Los Osos Valley about twelve miles northwest of the City of San Luis Obispo, comprise the Los Osos hydrologic basin. The relatively flat Los Osos alluvial plain typifies the basin's topography. Two parallel ranges, the Irish Hills and Park Ridge, border Los Osos Valley on the south and north respectively. Eto Creek, Los Osos Creek, and their minor tributaries are the main surface water drainages of the basin and flow northwesterly into Morro Bay estuary. According to Central Coast Regional Board's Water Quality Control Plan, the beneficial uses

X even  
CLOSE!

1. The Central Coast Regional Board adopted Resolution 83-13 on September 16, 1983; this resolution established a compliance time schedule, limited the number of new discharges, and prohibited discharges from all individual and community sewage disposal systems after November 1, 1988.

Topography described by someone unfamiliar with the AREA!

Craig M. Wilson

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OCT 13 1988

information.<sup>11/</sup> Following this meeting, C.A.W.S. petitioned the State Board to review the Central Coast Regional Board's Resolution 83-13, the immediately effective new discharge prohibition, the additional information reporting requirement, and three alleged inactions. The petitioners' contentions, taken approximately in the order given in the petition, are described below.<sup>12/</sup>

#### Analysis of Contentions

- Contention: Nitrates discharged from septic tank-subsurface disposal systems have not degraded ground water quality.

Response: Domestic (residential) wastewater contains many pollutants. Onsite wastewater treatment and disposal systems<sup>13/</sup> can effectively and efficiently reduce or remove many of these pollutants when their location is carefully selected and they are properly designed, constructed, and maintained. But, because the soil performs most treatment and removal, onsite systems cannot remove all pollutants or function properly if the site is inappropriate. For example, nitrogen occurs in wastewater as organic nitrogen, as ammonium, or in oxidized form as nitrite and nitrate. Nitrogen is an important plant nutrient; however, free ammonia can also be a fish toxicant and nitrates may harm animal and human health.<sup>14/</sup> Typically, the average concentration of total nitrogen in residential wastewater (before it enters a septic tank) is 63 mg/l<sup>15/</sup> and the mean concentration of total nitrogen in septic tank effluent is 45 mg/l.<sup>16/</sup> Thus, most nitrogen passes through septic tanks and is discharged into the soil.<sup>17/</sup> In the aerated zone beneath leachfield

Note  
(cont.)

NO<sup>1</sup>

This page (#4) of Memorandum to Craig M. Wilson  
is entered as evidence of the Boards  
Knowledge of Nitrogen Reduction ( $63-45 = 18^{\pm} \text{mg/l}$ )  
in Septic Tank operation.

This also Shows Average Septic Tank effluent  
is 45 mg/l ... 7 mg/l below the Oct. 05 well # 7L3  
(@ 52 mg/l (used by Prosecution April 28, '06))

Same well April '05 19 mg/l Nov '05 19 mg/l (act. before Dec '05)

Last Name	First	Location/address	Affiliation/issue
Achadjian	Katcho	San Luis Obispo, California	SLOCO BoS
Alexander	Dr.John	Cayucos, California	Expert-Wastewater
Allbright	Joyce	Los Osos, California	TaxpayerWatch
Asquith	Don	Los Osos, California	geologist
Baggett Jr.	Arthur G	Sacramento, California	SWRCB
Barrow	Al	Los Osos, California	CASE
Batson	Curt	San Luis Obispo, California	SLOCO Environ Health
Beardwood	Jack	Bay News	Wastewater Reporter
Beavers	Alan	Los Osos, California	
Beeton	John	San Luis Obispo, California	SLOCO Public Works
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Bhuta	Dr. Pravin	Los Osos, California	LOTTF advisor
Bhuta	Lila	Los Osos, California	LOTTF advisor
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Biggs	Shirley	San Luis Obispo, California	SLOCO BoS
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Bodeker	Dan	Los Osos, California	CSD General Manager
Bowker	George	Los Osos, California	citizen researcher
Brady	Leslie S	Los Osos, California	RWQCB
Braverman	John	Los Osos, California	Golden State Water
Brentnall	Dan	Los Osos, California	csd volunteer
Brewer	Peter	Los Altos, California	Author
Briggs	Peter	Morro Bay, California	SSMP researcher
Broadwater	Roger	Los Osos, California	Witness/prosecutor
Buel	David	Los Osos, California	SLOCO
Calhoun	Bruce	Los Osos, California	CSD Past
Cantu	Ann	Sacramento, California	Media- Bay News
Capps	Celeste	San Luis Obispo, California	SWRCB
Carruthers	Lois	Los Osos, California	US Congresswoman
Cesena	Ralph	Los Osos, California	Appraiser
Chipping	Chuck	Los Osos, California	CSD Board, LOTTF
Christie	David	San Luis Obispo, California	geologist, CNPS, LOCSD
	Andrew		committee member
			Sierra Club

Christie	Sarah	SLOCO Planning	Mont. Watson Harza
Clary	Steve	Cleath & Assoc.	
Cleath	Timothy		
Congalton	Dave	Radio Host,	
Coy	Bill	SLOCO Past	
Crawford	Ron	Historian	
Crizer	Bob	TaxpayerWatch	
Cunningham	Frank	Prior LOCSD engineer	
Daniels	Bruce	RWQCB Past	
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Fouche	John	LOCSD director	
Fredericks	Sharon	TaxpayerWatch	
Freiler	Frank	CSD Past Pres	
Gaglione	Rosie	SLOCO Public Utilities	
Garcia	Percy	RWQCB Doc 27 &28	
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